

DOCKETED

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SCE's Comments on the CEC Docket No. 15-IEPR-03: Commissioner Workshop on the 2016-2026 California Revised Electricity Demand Forecasts

Additional submitted attachment is included below.

December 31, 2015

California Energy Commission
Docket Office, MS-4
Re: Docket No. 15-IEPR-03
1516 Ninth Street
Sacramento, CA 95814-5512
docket@energy.ca.gov

Re: Southern California Edison Company's Comments on the California Energy Commission Docket No. 15-IEPR-03: Commissioner Workshop on the 2016-2026 California Revised Electricity Demand Forecasts

Dear Commissioner McAllister:

On December 17, 2015, the California Energy Commission (Energy Commission) held a Commissioner Workshop ("Workshop") on the 2016-2026 California Revised Electricity Demand Forecasts as part of the 2015 Integrated Energy Policy Report (2015 IEPR) process. Southern California Edison (SCE) participated in the Workshop and appreciates the opportunity to provide these written comments.

In evaluating the Energy Commission's Revised Electricity Demand Forecast, SCE finds the Energy Commission's revised load and peak forecast for the revised SCE Planning Area to be too low, relative to the Energy Commission's 2014 Forecast and SCE's own Sales Forecast. This is especially surprising given that the Energy Commission has revised SCE's Planning Area to be significantly larger, with the addition of Pasadena—suggesting that the load and peak forecasts would be incrementally higher.

The Energy Commission's revised 2015 peak estimate of 22,738 Megawatts (MW) for the newly enlarged SCE Planning Area (which now includes the city of Pasadena) is lower than SCE's estimated system peak of 23,077 MW and TAC area peak of 23,364 MW (which *excludes* Pasadena). The Energy Commission's revised SCE Planning Area peak forecast reduces peak load by 2,832 MW in 2025 from the 2014 CED Planning Area forecast and over 2,100 MW from SCE's most recent system forecast (see Attachment 1). This decrease in load is counterintuitive, and may be erroneous.

Based on comments provided by Energy Commission staff during and following the Workshop, SCE believes that the reduced peak load forecast for the enlarged SCE Planning Area

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are attributable to the Energy Commission's weather normalized peak estimate for 2015, as well as an increased impact of rooftop solar photovoltaic load. To better understand the discrepancy between SCE's and the Energy Commission's forecasts, and the potential reasons or errors causing it, SCE has requested data from Energy Commission staff, including actual 2014 and 2015 EMS CAISO TAC Area data that the Energy Commission used to compare the Energy Commission's and SCE's estimation of peak load for 2015.

Upon review and analysis of this data, SCE will provide supplemental comments on the Revised Demand Forecast, in hopes of revising this discrepancy and arriving at a more realistic forecast.

In conclusion, SCE appreciates the Energy Commission's consideration of these comments and looks forward to its continuing collaboration with the Energy Commission. Please do not hesitate to contact me at (916) 441-3979 with any questions or concerns you may have. I am available to discuss these matters further at your convenience.

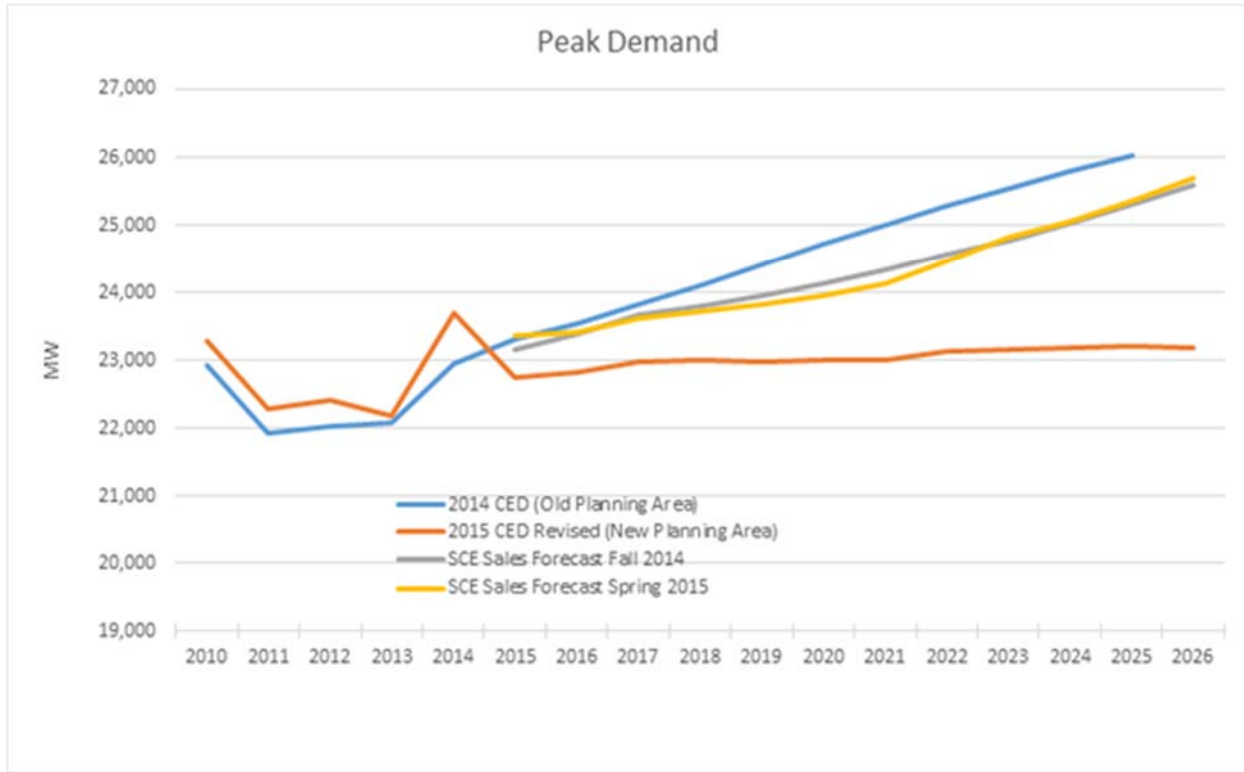
Very truly yours,

/s/ Catherine Hackney

Catherine Hackney

ATTACHMENT 1

ATTACHMENT 1



Peak Load Forecasts Comparison			
Year	2014 CED (Old Planning Area)	2015 CED Revised (New Planning Area)	SCE Sales Forecast Spring 2015 (System)
2014	22,943	23,689	--
2015	23,302	22,738	23,352
2016	23,537	22,815	23,420
2017	23,816	22,965	23,610
2018	24,114	23,007	23,715
2019	24,413	22,980	23,824
2020	24,724	23,006	23,953
2021	25,009	23,011	24,128
2022	25,281	23,118	24,465
2023	25,542	23,162	24,808
2024	25,784	23,169	25,044
2025	26,030	23,199	25,354
2026	--	23,171	25,695